REMARKS

Interview summaries

Applicants' representative would like to thank the Examiner for the telephonic interviews of January 4 and April 27, 2006. No agreement has been reached regarding patentability of the claims.

On January 4, in response to the Examiner's inquiry, Applicants' representative explained the specification's specific examples, such as "constant" and "variable" relations between characters, that provided support for the Amendment of October 20, 2005.

On April 27, 2006, Applicants' representative first clarified certain points in the Examiner's summary of the January 4 interview regarding the support for the Amendment. In his summary, the Examiner noted that "[a]ttorney indicates that since the character relationships listed in item 602 are not ordered by users, therefore the relationships are unordered." The Applicants' representative clarified that, although he mentioned that a user can select the character relations listed in relation screens 601 and 602, he did not indicate that being or not being "ordered by users" is related to the claimed subject matter. Instead, the Applicants' representative argued that, for each selection of a pair of characters in the relation screens 601 and 602, there are corresponding "variable" or "constant" relations. *See FIG. 6 and pages 13-15.* The "variable" relations are associated with video segments that are ordered in time, and the "constant" relations are associated with video segments that are unordered. *See, e.g., FIG. 2 and page 11.* According to one implementation, the different relationships, the associated video segments, and their ordering are specified in the visual DS 101. *See, e.g., FIG. 1 and pages 10 and 11.*

On April 27, claims 30 and 54 were also discussed in view of U.S. Pat. No. 6,469,711 to Foreman et al. ("Foreman"). Applicants' representative argued that Foreman's special effect items 192 do not disclose the claimed segment order information. *See Foreman's FIG. 10.* The Examiner argued that claim 39 did not specify sufficient details about the claim

term "unordered," and claim 54 did not specify sufficient details about the claim term "object." The Examiner also argued that the claims are not specific enough to differentiate a user interface from a data structure. Although Applicants' representative indicated that he disagrees with the Examiner, he agreed to amend the claims to more specifically point out the claimed subject matter as suggested by the Examiner.

Claims

Claims 30-49 and 54-57 were pending when last examined. With this Response, Applicants' have amended claims 30, 34, 38, 42, 46, 54, 55 and 57. No new matter has been added. Support for the amendment has been discussed in the Interview Summaries above.

Claim Rejections – 35 USC § 102

The Examiner stated that claims 50 and 53 were rejected. Claims 50 and 53, however, have been canceled.

Claims 30, 33, 34, 37, 38, 41, 42, 45, 46, and 49 were rejected under 35 U.S.C. 102(e) as being anticipated by Foreman. The Applicants' respectfully traverse the rejections.

Claim 30, as amended, recites an apparatus including a processor configured to generate segment group information in a data structure describing multimedia data. The segment group information defines a segment group that includes a plurality of segments selected from a multimedia stream, wherein the segment group information includes segment order information defining that two or more segments within the segment group are unordered relative to each other according to a time sequence.

The Examiner asserts that the claimed segment group information is disclosed by Foreman as items 192 in FIG. 10. The Applicants' respectfully disagrees.

Foreman discloses an interface 56 for editing a movie. *FIG. 9 and col. 10:56 to col. 11:10.* The interface 56 includes a representation of a timeline 162 and associated tracks. *Id.* The video track is split into three rows, including an effect subtrack, a video media subtrack, and an audio subtrack. *Id.* A second interface 153 includes a list of possible effects 192 that

can be used to select special effects to be applied to transitions between two clips. *FIG. 10 and col. 12:19-44.* Each effect in the list refers to a computer program which causes the respective effect to be made. *Id.* When an effect is selected, a corresponding effect segment is created in the effect subtrack of the video track. *Id.* In sum, Foreman discloses a user interface providing a list of special effects that can be potentially applied to any transition between clips.

First, the claim requires generating segment group information in a data structure, not in a user interface. Foreman's special effects list, however, is in a user interface.

Second, Foreman does not disclose, or even suggest, segment order information defining that two or more segments within the segment group are unordered relative to each other according to a time sequence. The special effect list is simply a list of options from which special effects may be potentially selected and applied to any transition in a segment group. Thus, the special effect list by itself does not define any feature of any particular segment group, and accordingly cannot define that two or more segments within the segment group are unordered relative to each other according to a time sequence, as required by the claim. Furthermore, although the selected special effects create effect segments, the effects segments are ordered in a time line, in particular, at the transitions for which they have been applied. *See, e.g., effect segment 190 in FIG. 10.* Thus, Foreman fails to disclose segment group information that includes segment order information defining that two or more segments within the segment group are unordered relative to each other according to a time sequence.

Because Foreman fails to disclose at least the above limitations, claim 30 is allowable. Claim 33 depends from claim 30 and is allowable for at least the same reasons.

Claim 34, as amended, recites a method for processing multimedia data. The method includes generating segment group information for a data structure. The segment group information includes segment order information defining that two or more segments within the segment group are unordered relative to each other according to a time sequence. As discussed above with reference to claim 30, Foreman fails to disclose these limitations. Thus, claim 34 is allowable.

Claim 37 depends from claim 34 and is allowable for at least the same reasons. The Examiner states that claim 37 "is of the same scope as claim 33." Applicants' respectfully note that each claim of the present application has a different scope. For example, claim 33 recites an apparatus and claim 37 recites a method.

Claim 38, as amended, recites an apparatus including a processor configured to receive segment group information defining a segment group in a data structure. The segment group information includes segment order information defining that two or more segments within the segment group are unordered relative to each other according to a time sequence. As discussed above with reference to claim 30, Foreman fails to disclose these limitations. Thus, claim 38 is allowable.

Claim 41 depends from claim 38 and is allowable for at least the same reasons. The Examiner states that claim 41 "is of the same scope as claim 33." Applicants' respectfully note that each claim of the present application has a different scope. For example, claim 33 and claim 41 depend from independent claims of different scopes.

Claim 42, as amended, recites a method for processing multimedia data. The method includes storing segment group information in a data structure, wherein the segment group information includes segment order information defining that two or more segments within the segment group are unordered relative to each other according to a time sequence. As discussed above with reference to claim 30, Foreman fails to disclose these limitations. Thus, claim 42 is allowable.

Claim 45 depends from claim 42 and is allowable for at least the same reasons. The Examiner states that claim 45 "is of the same scope as claim 33." Applicants' respectfully note that each claim of the present application has a different scope. For example, claim 33 recites an apparatus and claim 45 recites a method.

Claim 46, as amended, recites a storage medium storing a data structure that includes segment group information. The segment group information includes segment order information defining that two or more segments within the segment group are unordered relative to each other according to a time sequence. As discussed above with reference to claim 30, Foreman fails to disclose these limitations. Thus, claim 46 is allowable.

Claim 49 depends from claim 46 and is allowable for at least the same reasons. The Examiner states that claim 49 "is of the same scope as claim 33." Applicants' respectfully note that each claim of the present application has a different scope. For example, claim 33 recites an apparatus and claim 49 recites a storage medium.

Claim Rejections – 35 USC § 103

Claims 31, 32, 35, 36, 39, 40, 43, 44, 47, 48, and 54-57 are rejected under 35 U.S.C. 103(a) as being unpatentable over Foreman in view of U.S. Patent No. 6,278,466 to Liou et al. ("Liou"). The Applicants' respectfully traverse the rejections.

Claims 31, 32, 35, 36, 39, 40, 43, 44, 47, 48 and 54-57 are dependent claims, whose respective base claims recite segment order information defining that two or more segments within the segment group are unordered relative to each other according to a time sequence. As discussed above, Foreman fails to disclose this limitation. Liou is equally lacking.

Liou discloses a system for interactively organizing and browsing video streams. *Abstract.* Although Liou discloses grouping video shots into a tree structure, Liou's tree structure preserves the time order among shots. *Col. 5:31-34.* Thus similar to Foreman, Liou also fails to disclose segment order information defining that two or more segments within a segment group are unordered relative to each other according to a time sequence.

Because neither Foreman nor Liou discloses the claimed segment order information, no *prima facie* case of obviousness has been established, and claims 31, 32, 35, 36, 39, 40, 43, 44, 47, 48 and 54-57 are allowable.

CONCLUSION

Applicants respectfully request that the pending claims be allowed and the case passed to issue. Should the Examiner wish to discuss the Application, it is requested that the Examiner contact the undersigned at (415) 772-7493.

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5/18/06 Richard A. Pask

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